

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**SMITHGROUP, INC.,**

Plaintiff,

**v.**

**PURE ARCHITECTURE AND  
DEVELOPMENT, PLLC d/b/a Pure  
Architects, and MARY FREE BED  
REHABILITATION HOSPITAL, INC., a  
Michigan corporation,**

Defendants.

**Case No. 1:24-cv-00249-RJJ-RSK**

**Hon. Robert J. Jonker**

**JURY TRIAL DEMANDED**

**PLAINTIFF SMITHGROUP INC.’S MOTION FOR  
PRELIMINARY INJUNCTION**

Plaintiff, SmithGroup, Inc. (“SmithGroup”) moves this Court for a Preliminary Injunction against Defendants Pure Architecture and Development, PLLC d/b/a Pure Architects (“Pure Architects”) and Mary Free Bed Rehabilitation Hospital, Inc. (“Mary Free Bed”) (collectively “Defendants”) for the reasons set forth in the accompanying brief filed concurrently herewith.

SmithGroup requests that the Court grant SmithGroup’s Motion for Preliminary Injunction directing Defendants to cease and desist from any and all continued infringement of SmithGroup’s copyrighted architectural works, including but not limited to the copying,

distribution, and publication of SmithGroup's original works of authorship or derivative works thereof, and from the construction of any structures including SmithGroup's copyrighted subject matter.

WHEREFORE, SmithGroup respectfully requests that the Court GRANT this motion.

**BROOKS KUSHMAN P.C.**

Date: March 22, 2024

/s/ John S. LeRoy  
John S. LeRoy (P61964)  
Reza Roghani Esfahani (P83787)  
150 W. Second St., Suite 400N  
Royal Oak, MI 48067-3846  
Telephone: (248) 358-4400 / Fax: (248) 358-3351  
Email: [jleroy@brookskushman.com](mailto:jleroy@brookskushman.com)  
[resfahani@brookskushman.com](mailto:resfahani@brookskushman.com)

*Attorneys for SmithGroup*

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that on March 22, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Western District of Michigan using the ECF System which will send notification to any registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

I also certify that on March 22, 2024, I electronically mailed the following counsel who has each represented to me (on the dates stated in the Certificate of Concurrence with L.R. 7.1, filed concurrently herewith) that they represent their respective parties.

John G. Cameron Jr. <b>DICKINSON-WRIGHT</b> 200 Ottawa Ave., N.W. Suite 900 Grand Rapids, MI 49503-2427 Telephone: 616-336-1010 <a href="mailto:jcameron@dickinsonwright.com">jcameron@dickinsonwright.com</a>	Christopher A. Cornwall <b>DICKINSON-WRIGHT</b> 500 Woodward Avenue Suite 4000 Detroit, MI 48226-3425 Telephone: 313-223-3530 <a href="mailto:ccornwall@dickinsonwright.com">ccornwall@dickinsonwright.com</a>
<i>Attorneys for Defendant, Mary Free Bed Rehabilitation Hospital, Inc.</i>	<i>Attorneys for Defendant, Pure Architecture and Development, PLLC d/b/a Pure Architects</i>

/s/ John S. LeRoy

John S. LeRoy (P61964)  
150 W. Second St., Suite 400N  
Royal Oak, MI 48067-3846  
Telephone: (248) 358-4400 / Fax: (248) 358-3351  
Email: [jleroy@brookskushman.com](mailto:jleroy@brookskushman.com)

*Attorneys for SmithGroup*